



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

JUN 16 2010

Daniel Wilkus
Director, Air Programs
Westar Energy, Inc.
818 S Kansas Avenue
PO Box 889
Topeka, Kansas 66601-0889

RE: Jeffrey Unit 2 CAM Testing Deferral

Dear Mr. Wilkus:

On June 6, 2010, we received a request from Westar Energy to defer compliance assurance monitoring (CAM) PM performance testing on Jeffrey Unit 2 until the electrostatic precipitator is rebuilt. Under the Consent Decree, Westar is required to optimize ESP performance on all three Jeffrey units to meet a particulate limit of 0.03 lb per million BTU (lb/mmBTU). To satisfy this requirement for Unit 2, Westar plans to rebuild the ESP beginning in Spring 2011, and will complete extensive PM testing within 270 days of completion to demonstrate compliance with the Consent Decree PM emission limitation. Westar will also use this test data to refine its Unit 2 CAM plan for PM. In the meantime, Westar has proposed to use the Jeffrey Unit 1 CAM plan that is in development to demonstrate that Unit 2 is in compliance with the Consent Decree, until the Unit 2 ESP is rebuilt.

Because Westar already has a CAM plan approved for Unit 2, which demonstrates representative conditions under which the unit can meet the 0.03 lb/mmBtu PM rate, EPA approves the continued use of this plan until Westar completes the Unit 2 ESP rebuild and the associated, refined CAM testing. This simultaneously satisfies Westar's request to defer the testing in the short-term and assures that Unit 2 continues to meet the PM requirements of the Consent Decree.

Westar plans to renew its CAM plan for Unit 1 and has scheduled performance testing during the week of June 20th. We encourage Westar to continue coordinating with the Kansas Department of Health and Environment to assure that the testing protocol meets their requirements.

If you have any questions, please contact Jon Knodel of my staff at (913) 551-7622 or knodel.jon@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Smith', with a stylized flourish at the end.

Mark Smith
Chief, Air Permitting and Compliance

cc: Vick Cooper, KDHE